

Exhibit C

Huong Hoang

July 26, 2012

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UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF WASHINGTON, AT SEATTLE

Huong Hoang,)
Plaintiff,)
vs.) No. 2:11-CV-01709-MJP
Amazon.com, Inc., et al.,)
Defendants.)

PURSUANT TO PROTECTIVE ORDER, PORTIONS OF THIS
TRANSCRIPT DESIGNATED ATTORNEYS EYES ONLY
and CONFIDENTIAL (SEE INDEX PAGE)

VIDEOTAPED DEPOSITION UPON ORAL EXAMINATION
OF

HUONG HOANG, Volume 1

9:04 a.m.

July 26, 2012

1201 Third Ave

Seattle, Washington

Margaret Walkky, CCR, RPR, RMR, CRR
Court Reporter, License No. 2540

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1 A P P E A R A N C E S

2

3 For Plaintiff: DOV M. SZEGO
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12 For Defendants: BREENA M. ROOS
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14 Perkins Coie
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16 Seattle, Washington 98101
17 206-359-8000
18 broos@perkinscoie.com

19

20 Also Present: Charles Wright, Amazon
21 Patrick Norton,
22 Videographer

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1 BY MS. ROOS:

2 Q. Do you have a Facebook account?

3 A. I do.

4 Q. Is that account under the name Junie Hoang
5 or Huong Hoang?

6 A. My user name? It's under Junie Hoang.

7 Q. So your Facebook profile says Junie Hoang
8 at the top?

9 A. Yes.

10 Q. Do you have a LinkedIn account?

11 A. Yes.

12 Q. What name is that account under?

13 A. Junie.

14 Q. What about Twitter?

15 A. Twitter I do have, same.

16 Q. What name is that under?

17 A. Same name, Junie.

18 Q. Do you have a MySpace account?

19 A. Yes. I still have a MySpace account.

20 Q. What name is that?

21 A. Same name.

22 Q. Any other types of social media?

23 A. Just those four.

24 (End of CONFIDENTIAL material.)

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1 BY MS. ROOS:

2 Q. And you're juniehoang@hotmail.com email?

3 A. Yes.

4 Q. Is juniehoang@hotmail.com the email
5 address that you used to subscribe to IMDbPro?

6 A. I believe it was.

7 Q. And if you move the back of the page, the
8 very last page, the last entry says, "June 15, 1:36:44
9 2004: New account subscription."

10 Do you see that?

11 A. Which one? This?

12 (End of CONFIDENTIAL material.)

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1 BY MS. ROOS:

2 Q. Anyone else?

3 A. George.

4 Q. Is that George Young?

5 A. Yes.

6 Q. Who is George Young?

7 A. He's a friend.

8 Q. Does he also work for Kalypso?

9 A. Yes.

10 (End of CONFIDENTIAL material.)

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1 BY MS. ROOS:

2 Q. Does anyone else at Kalypso, did anyone
3 else at Kalypso know your legal name before January
4 2012?

5 A. Probably just payroll.

6 Q. Payroll. Anyone else at Kalypso?

7 A. If they do, I don't know.

8 Q. What about when you worked at Texas Home
9 Health, did anyone there know your legal name?

10 A. They knew me by my legal name because
11 that's how I got paid.

12 Q. But did your co-workers call you Junie?

13 A. No.

14 (End of CONFIDENTIAL material.)

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1 A. Yes.

2 Q. What acting jobs were you referring there
3 to?

4 A. I believe one was for an industrial. I
5 didn't have the details of it. One was an industrial
6 and I believe the other one was, I think it was a film
7 or an independent. I don't have the exact details of
8 it.

9 Q. Okay. So let's talk about the industrial
10 first.

11 A. Uh-huh.

12 Q. What industrial was that for?

13 A. It was some in-house tape for some small
14 company.

15 Q. Did you audition for that?

16 A. No, I didn't.

17 Q. Did you apply for the role in any way?

18 A. I believe I submitted for it and they
19 called me.

20 Q. What did you submit?

21 A. I think I gave them -- I must have sent
22 them my profile.

23 Q. What profile?

24 A. I think it was just my head shot and
25 resume, so my acting resume.

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1 Q. So you sent them your head shot and your
2 resume and then you said they called you?

3 A. Right, they called me.

4 Q. On the phone?

5 A. Yes.

6 Q. And what did they say?

7 A. They just said that we're worried that you
8 might be not fit for the part.

9 Q. Did they say you were too old?

10 A. I'm pretty sure it was the reason, but I
11 can't -- I mean, I don't have proof.

12 Q. Can you please answer the question.

13 Did they say it was because you were too
14 old?

15 A. He said he was worried about the age range
16 portrayal.

17 Q. Who was it that you spoke with?

18 A. I didn't keep his name.

19 Q. Do you recall what website or agency you
20 submitted your head shot and resume through?

21 A. I self-submitted it.

22 Q. Was it through a website?

23 A. I believe I saw the posting and I
24 submitted it.

25 Q. Was the posting on a website?

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1 that role?

2 A. I think I may have emailed the person.

3 Q. Who did you email?

4 A. It was one of the postings online and I
5 just emailed inquiring about it.

6 Q. So you saw the posting online?

7 A. Yes.

8 Q. Do you still have the email?

9 A. No, I don't.

10 Q. Do you recall where you saw the posting
11 online?12 A. It was from Film Castings. It could have
13 been from Austin. I don't remember exactly.

14 Q. Do you recall it was in Texas?

15 A. It was in Texas.

16 Q. So you emailed indicating your interest?

17 A. Yes.

18 Q. Did you attach anything to the email?

19 A. I believe that one I just sent in a
20 request asking about the project.

21 Q. What do you mean, a request?

22 A. Like how do I -- there was a dialogue
23 about how do I submit or more information about the
24 project.

25 Q. Did you give them your profile, your

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1 resume, your head shot?

2 A. I think I may have given them a link.

3 Q. A link to what?

4 A. To one of my websites.

5 Q. Was that juniehoang.com?

6 A. It might have been that one.

7 Q. Do you have other websites?

8 A. No, just those. I think they're on my
9 website. The links to all the other websites are on my
10 website.

11 Q. We'll go back to that in a minute.

12 So you said there was a dialogue about how
13 you submit?

14 A. For that project? For that particular
15 project, I think I inquired about it through email.

16 Q. What led you to believe that you lost this
17 acting job because you were too old?

18 A. Just by the tone of the conversation.

19 Q. What do you mean "tone of the
20 conversation"?

21 A. Sometimes people will look you up and they
22 don't want to tell you why they're not interested in
23 working with you.

24 Q. Did they say they looked you up?

25 A. I sent them -- they asked for my link.

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1 Q. What do you mean, your link?

2 A. Like where can we see your information.

3 Q. What did you provide them?

4 A. I don't remember exactly which link it

5 was. It could have been my official website. I don't

6 remember which link it was.

7 Q. Did you provide them with a link to your

8 IMDb profile?

9 A. I think at the time my profile may have

10 attached to my actual website.

11 Q. Did you provide them a link to your IMDb

12 profile file?

13 A. I think they already looked on my IMDb

14 profile. I don't know if I --

15 Q. Ms. Hoang, please answer the question.

16 Did you provide them a link to your IMDb

17 profile?

18 A. I don't think I did.

19 Q. But you may have provided them a link to

20 your website?

21 A. Right.

22 Q. What did they tell you about not getting

23 the role?

24 A. They just said we'll call you back.

25 Q. Did they tell you it was because of your

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1 A. Yes.

2 Q. So it looks like it's a submission dated

3 June 19th, 2004; is that right?

4 A. Yes.

5 Q. And it includes the date of birth for

6 Junie Hoang as July 16th, 1978?

7 A. Yes.

8 Q. So you submitted back in 2004 that

9 birthday using Greg Carter's account?

10 A. Yes.

11 Q. July 16th, 1978 is not your birthday, is
12 it?

13 A. It's the birthdate to my stage name.

14 Q. It is not your birthday, is it?

15 A. Not to my legal name, no.

16 Q. Were you born on July 16, 1978?

17 A. No.

18 Q. So it is not your birthday?

19 A. No.

20 MR. SZEGO: Asked and answered.

21 Q. So this was false, correct?

22 A. No, that's not an accurate birthdate to my
23 legal name.24 Q. It's not an accurate birthdate. There's
25 no one named Junie Hoang to your knowledge born on July

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1 C E R T I F I C A T E

2 STATE OF WASHINGTON) ss.

3 COUNTY OF KING)

4 I, the undersigned Registered Merit
5 Reporter and Washington Certified Court Reporter do
6 hereby certify that the foregoing deposition upon oral
7 examination of HUONG HOANG, Volume 1 was taken before
8 me on July 26, 2012 and transcribed under my direction;

9 That the witness was duly sworn by me
10 pursuant to RCW 5.28.010 to testify truthfully; that
11 the transcript of the deposition is a full, true, and
12 correct transcript to the best of my ability; that I am
13 neither attorney for, nor a relative or employee of,
14 any of the parties to the action or any attorney or
15 counsel employed by the parties hereto, nor financially
16 interested in its outcome.

17 IN WITNESS WHEREOF, I have hereunto set my
18 hand and seal this date: August 27, 2012.

19

20

21

22

23 Margaret Walkky, Registered Merit Reporter,
24 Certified Court Reporter No. 2540.

25 License expires July 18, 2013